

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

Case No. 1:23–CV–00223

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as “LAINEYBOT,”
“LAINEY” and “KAI,”

Defendants.

DECLARATION OF JAMES R.
MARSH IN SUPPORT OF
PLAINTIFF’S MOTION TO PROCEED
USING A PSEUDONYM

Honorable Hala Y. Jarbou

**DECLARATION OF JAMES R. MARSH IN SUPPORT OF PLAINTIFF’S
MOTION TO PROCEED USING A PSEUDONYM**

I, JAMES R. MARSH, hereby declare the following to be true and correct under penalty of perjury of the laws of the United States of America:

1. I am over 18 years of age and I have personal knowledge of the facts set forth in this declaration and, if called on to do so, can and will testify competently to the same.

2. I make this declaration in support of Plaintiff’s Motion to Proceed using a Pseudonym.

3. I am the Founding Partner of Marsh Law Firm PLLC.

4. Marsh Law Firm PLLC, along with attorney Lisa Haba of The Haba Law Firm, P.A., represents Plaintiff in the above captioned matter.

5. I am familiar with Plaintiff’s concerns related to her status as a child sex abuse survivor and victim of online exploitation.

6. I am making this declaration based on my own personal knowledge and professional experience as an attorney.

7. No court has ever ordered the Plaintiff to proceed using her true identity in any court proceeding.

8. Plaintiff's surname is not associated with this matter online or in the media.

9. Plaintiff believes a court order allowing her to proceed using a pseudonym while allowing her surname to remain confidential will protect her privacy and alleviate her grave concerns concerning her personal safety and reputation.

10. Plaintiff instructed me to seek the Court's permission to allow her to proceed in this case using a pseudonym in order to protect her from harassment, injury, ridicule, and life-long embarrassment.

11. Plaintiff has suffered and continues to suffer from grievous psychological harm resulting from the child exploitation, sex trafficking, and sexual assault crimes of which she was a victim.

12. Plaintiff suffers from anxiety and hyper-vigilance caused by the actions that lead to these claims.

13. Plaintiff lives in daily fear that someone will discover her true identity and link her to the traumatic experience she experienced as a child.

14. Plaintiff believes, as do I, that revealing her legal surname to the public will put her in significant physical and emotional danger.

15. Defendants Google LLC and YouTube LLC represented on March 28, 2023 that they do not oppose this request allowing the Plaintiff to proceed using a pseudonym.

Executed this 28th day of March, 2023 in New York, NY.



James R. Marsh
Attorney for the Plaintiff